



TO: **W-2 Agencies**
RSS-funded Agencies
RMS-administering Clinics

FROM: Bojana Zoric Martinez, Director
Bureau of Refugee Programs
Division of Family and Economic Security
Department of Children and Families

SUBJECT: COVID-19 Office of Refugee Resettlement Waiver Extensions

BRP OPERATIONS MEMO			
No:	21-02		
DATE:	04/13/2021		
RCA	<input checked="" type="checkbox"/>	RHP	<input type="checkbox"/>
RMA	<input checked="" type="checkbox"/>	RMS	<input type="checkbox"/>
RSI	<input type="checkbox"/>	RSS	<input checked="" type="checkbox"/>
RYM	<input type="checkbox"/>	SOR	<input type="checkbox"/>
W-2	<input type="checkbox"/>	WFTCP	<input type="checkbox"/>

CROSS REFERENCE:

- [BRP Operations Memo 20-20](#)
- [BWF Operations Memo 20-11](#)
- [Office of Refugee Resettlement \(ORR\) Policy Letter 20-03](#)
- [ORR Policy Letter 20-04](#)
- [ORR Policy Letter 20-06](#)
- [ORR Policy Letter 21-01](#)
- [ORR State Letter 99-17](#)

EFFECTIVE DATE:

January 20, 2021

PURPOSE: The purpose of this memo is to communicate a summary of continued extensions to waivers that allow for various exceptions to ORR regulations. These waivers give the Department of Children and Families (DCF) and its refugee programs' contractors the necessary flexibility to continue to respond to the spread of COVID-19, and its impact on ORR-eligible populations.

BACKGROUND: [Policy Letters 20-04](#) and [20-03](#) initially introduced a series of waivers and regulatory exceptions to help address the various impacts of COVID-19. Those waivers expired on September 30, 2020. [Policy Letter 20-06](#) subsequently extended those waivers through January 31, 2021, due to the continued impact of COVID-19. The details of the extension were summarized, with reference to the policy letter, in [BRP Operations Memo 20-20](#). [Policy Letter 21-01](#) provides an additional extension that expires on April 30, 2021. Each of the waivers relax various conditions of eligibility and program requirements for Refugee Support Services (RSS), Refugee Cash Assistance

(RCA), Refugee Medical Assistance (RMA), Refugee Medical Screenings (RMS), and ORR set-asides and discretionary grant programs (e.g. Refugee School Impact, Refugee Youth Mentoring, and Services to Older Refugees).

Details of waivers pertinent to the recipients of this memo are summarized below, with reference to previously published memos and letters. as well as any additional provisions introduced in the waiver's extension, are detailed below. All the terms of [Policy Letter 21-01](#) are in effect until April 30, 2021, unless otherwise specified.

These waivers are consistent with refugee policy objectives and will allow ORR eligible populations affected by COVID-19 to receive critical assistance and services. ORR will continue to assess the ongoing impact of COVID-19 on ORR eligible populations.

WAIVERS

1. Eligibility Determinations for ORR Benefits and Services

The terms of this waiver, further described in [BWF Operations Memo 20-11](#) and [PL 20-06](#), have been extended with no additional provisions. ORR program eligibility determinations may be made virtually if necessary and must be supported with a subsequent written declaration as soon as possible.

2. Refugee Cash Assistance and Conditions for Receipt of RCA

The terms of this waiver have been further extended through April 30, 2021, rather than through January 31, 2021, as previously described in [BWF Operations Memo 20-11](#) and [PL 20-06](#). For those who became eligible and continue to be otherwise eligible for RCA after April 1, 2019, and before September 1, 2020, the eligibility period has been extended through April 30, 2021. As such, for clients who became eligible for RCA on or after September 1, 2020, the eligibility period will remain eight months.

The terms of the waiver detailed in [PL 20-06](#) pertaining to delays in Social Security Administration (SSA) appointments, which allow states to enroll clients into RCA where an agency can document that a client has not been able to successfully for a social security card, continue to apply.

3. Refugee Medical Assistance Eligibility Period

[Policy Letter 20-06](#) extended the RMA eligibility period through January 31, 2021; [Policy Letter 21-01](#) furthermore extends the eligibility period through April 30, 2021. For clients who became eligible for RMA after September 1, 2020, the eligibility period will remain at eight months. The terms of the waiver detailed in [PL 20-06](#) pertaining to delays in SSA appointments, which allow states to enroll clients into RMA where an agency can document that a client has not been able to successfully for a social security card, continue to apply.

4. Refugee Medical Screenings

[Policy Letter 20-06](#) waived the 90-day requirement for Refugee Medical Screenings and allows the provision of medical screenings without prior determination of eligibility for Medicaid, CHIP, or RMA beyond the 90 days after a refugee's initial date of entry.

The terms of the waiver, detailed in [PL 20-06](#) pertaining to the use of RMA funds for vaccinations, were further extended with [PL 21-01](#), which allows for the waiver of relevant elements of [State Letter 99-17](#) upon request. Within the new parameters, RMA funds may be utilized for vaccinations regardless of when the clients received their refugee medical screening, as long as the vaccines are not covered by another federally funded program (e.g. Medicaid). These allowances have been extended through April 30, 2021. In addition, if vaccinations for COVID-19 become available, this waiver authorizes the use of RMA funds to cover this cost, as long as it is not covered by another federally funded program.

5. Refugee Support Services Funding for Emergency and Other Assistance

ORR will continue to permit the use of RSS base funding for additional, immediate, and emergency services, such as transitional housing assistance and emergency payments to cover essential services such as utilities and housing, due to income loss from job disruption or loss related to COVID-19. These conditions will apply through April 30, 2021, and pertain to funds previously allocated. They do not include the provision of any additional funds, so ORR advises that such waivers are requested strategically and only after any and all other available emergency assistance has been requested. Agencies should first determine that the individuals seeking assistance have already received all available emergency assistance before providing RSS emergency assistance in order to maximize funding and services. ORR continues to authorize the use of RSS funding for supplying and distributing personal protective equipment (PPE) and other supplies that mitigate the spread of COVID-19, which is a provision that was introduced with [PL 20-06](#).

6. Refugee Support Services Set Asides

The flexibility for RSS set aside funding, as detailed in [PL 20-06](#), has been extended through April 30, 2021, by [PL 21-01](#).

7. Refugee Support Services Extended Eligibility Period

ORR will continue, through April 30, 2021, to waive upon request the 60-month eligibility period for RSS for the provision of support services to those in extreme circumstances (e.g., a client who risks eviction, a client who is unable to pay for heating during frigid winter months). This waiver includes the RSS set-aside programs and applies to all ORR eligible populations.

8. Provision of ORR Funded Services

States and provider agencies should continue to make all efforts to continue services to the highest degree possible utilizing online resources, online education, and virtual contacts, or other means that are consistent with the guidance of local public health entities, as previously detailed in [PL 20-06](#).

CARES WORKER WEB (CWW)

For any eligibility or program requirement exceptions granted by these extended waivers, agencies should continue to utilize case comments to document the reason for the exception.

REPORTS

For any eligibility or program requirement exceptions granted by these extended waivers, agencies should continue to utilize comments sections in reports submitted to DCF for federal reporting purposes in order to document the reason for the exception.

TRAINING

No additional training will be required; agencies are encouraged to reach out to their DCF contacts in the Bureau of Refugee Programs (BRP) for guidance.

AGENCY ACTION

Agencies should ensure that program applicants and participants are informed of extended eligibility periods and waived program requirements. When enrolling and serving participants, agencies should discuss the finite time period during which these waivers are in effect.

CONTACTS

Questions regarding these waivers should be directed to the BRP team:

Bojana Zoric Martinez (Bureau Director): bojana.zoricmartinez@wisconsin.gov

Ben York (Refugee Programs Section Manager): ben.york@wisconsin.gov

Amelia Salem: amelia.salem@wisconsin.gov

Anwar Sallumi: anwar.sallumi@wisconsin.gov

Natasa Torbica: natasa.torbica@wisconsin.gov

Rebekah Davis: rebekah.davis@wisconsin.gov